UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 8, 2003

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for the Cornell-Dubilier Electronics Superfund Site

FROM: JoAnn Griffith, Chair
National Remedy Review Board

TO: George Pavlou, Director
Emergency and Remedial Response Division
EPA Region 2

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed cleanup action for the Cornell-Dubilier Electronics Superfund Site in New Jersey. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

The Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control response costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions prior to their being issued for public comment. The board reviews all proposed cleanup actions that exceed its cost-based review criteria.

The NRRB evaluates the proposed actions for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates

for alternatives; regional, state/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

Generally, the NRRB makes advisory recommendations to the appropriate regional decision maker. The region will then include these recommendations in the administrative record for the site, typically before it issues the proposed cleanup plan for public comment. While the region is expected to give the board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of response options, may influence the final regional decision. The board expects the regional decision maker to respond in writing to its recommendations within a reasonable period of time, noting in particular how the recommendations influenced the proposed cleanup decision, including any effect on the estimated cost of the action. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

Overview of the Proposed Action

The Cornell-Dubilier Electronics site is located in a mixed commercial, industrial, and residential area of South Plainfield, New Jersey. It includes a former manufacturing facility that is now an industrial park, portions of a stream, and a number of neighboring commercial and residential properties that have been contaminated with polychlorinated biphenyls (PCBs). The PCB contamination is believed to be associated with manufacturing at Cornell-Dubilier Electronics, Inc., which operated at the facility from 1936 to 1962. The facility property is targeted for redevelopment and, in this regard, the local government has already approved a redevelopment plan. The major focus of the region's preferred remedy is to remove principal threat wastes while capping residually-contaminated soils so that the cleanup will allow for redevelopment of the property.

NRRB Advisory Recommendations

The NRRB reviewed the informational package for this proposal and discussed related issues with Region 2 site manager Pietro Mannino on August 26, 2003. Based on this review and discussion, the NRRB offers the following comments.

- The region includes a multilayer cap as an element of several soil cleanup alternatives. However, the hardscape (i.e., that part of the site consisting of structures, parking areas, and walkways, made with hard materials) that may be included in the site redevelopment plan could be designed to offer performance characteristics similar to those of a cap. The board recommends that the Region coordinate the cleanup plan with the redevelopment efforts to assess the extent to which hardscape could be used in place of full site capping. The Board also recommends that the Region develop performance criteria for the hardscaping and cap that will prevent vapor intrusion into any buildings constructed on the site.

- For the soil alternatives, the board notes that operation and maintenance (O&M) cost estimates are identical, presumably based solely on a percentage of the cap cost. The Board recommends that the region refine O&M cost estimates to be alternative- and time frame-specific for Alternatives S-3 through S-6.

- Relocation costs for the building alternatives were not included in the information presented to the board. The Board recommends that the region develop and include in the feasibility study and other decision documents estimates for business relocation costs for Alternatives B-2 and B-3.

- As presented to the board, the preferred soil alternative (S-3) is more costly than several other alternatives. A combination of excavation and disposal, volatile organic compound removal, and soil stabilization may provide cost savings and be protective. The board recommends that the region evaluate a combination alternative (S-3, S-4, and S-5) that may provide cost savings while also allowing the flexibility necessary to implement redevelopment in a timely manner.

- The board notes that the region's preferred alternative involves the removal and off-site disposal of 152,000 cubic yards of "principal threat" waste. Information presented to the board indicates that approximately 80 percent of this volume is 500 ppm or greater PCB-contaminated waste. The volume of soil proposed to be removed appears to be driven by the PCB contamination. Given that approximately 20 percent of the volume is non-PCB waste (e.g., metals), the board recommends that the region review and evaluate appropriate cleanup levels for metals and whether doing so would reduce waste volume.

- The board considers excavation and off-site disposal to be viable technologies at this site, and understands that excavation of shallow soil would be intended to protect future workers, while deeper excavation would be intended to protect ground water. However, the board notes that there is uncertainty surrounding the OU3 ground water study (that is, the extent to which contamination removal is necessary to protect ground water). Therefore, the board recommends that the region evaluate the potential cost savings of setting the depth of excavation at a level to protect future workers if the OU3 remedial investigation indicates that any remaining deeper soil contamination would not affect a ground water remedy. If significant cost savings would result, the board recommends that the region include in its proposed remedy a contingency to that effect. For example, an alternative excavation depth could be one foot below the depth required to install a sewer line. This contingency could potentially result in a significant cost savings due to reductions in the volume of soil requiring excavation, while still protecting human health and the environment and allowing redevelopment to occur.

The NRRB appreciates the region's efforts in working together with the potentially responsible parties, state, and community groups at this site. We encourage Region 2 management and staff to work with their regional NRRB representative and the Region 2/6 Center in the Office of Site Remediation and Technology Innovation to discuss any appropriate followup action.

Thank you for your support and the support of your managers and staff in preparing for this review. Please call me at 703-603-8774 should you have any questions.

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